

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**EMMANUEL OGEBE,**

**Plaintiff,**

**v.**

**DOW JONES & COMPANY, DREW  
HINSHAW, JOE PARKINSON, AND  
GBENGA AKINGBULE,**

**Defendants.**

**Civil No. 1:19-cv-00426-LO-IDD**

**JOINT MOTION FOR EXTENSION OF TIME**

Pursuant to Federal Rules of Civil Procedure 6(b), 16(b)(2), and 26(f)(1) and Local Civil Rules 7 and 26, Plaintiff Emmanuel Ogebe and Defendants Dow Jones & Company, Inc. d/b/a *The Wall Street Journal* (“WSJ”), Drew Hinshaw, and Joe Parkinson, through counsel, stipulate and jointly move this Court for entry of an Order extending the deadline for Plaintiff to respond to Defendants’ Motions to Dismiss to and including August 31, 2019, and the deadline for Defendant to reply in support of its Motion to Dismiss to and including September 14, 2019. The parties also jointly move this Court for entry of an Order setting the date of their Rule 26(f) conference as no later than October 15, 2019, and the Rule 16(b) conference on October 30, 2019, or such later date as the Court’s schedule permits.

1. Plaintiff commenced this action on April 10, 2019. *See* Dkt. 1. After receiving an extension from the Court, Dkt. 11, WSJ filed its Motion to Dismiss on July 24, 2019, Dkt. 17. The Court also granted WSJ’s motion for an additional five pages for its Memorandum of Points and Authorities in support of its Motion to Dismiss because of the number of statements in the Article at issue challenged in the Complaint and the complexity of the legal issues raised in that

Motion. *See* Dkt. 15. Defendants Hinshaw and Parkinson joined in the WSJ Motion to Dismiss on July 30, 2019. Dkt. 28.

2. The hearing on Defendants' motions to dismiss is set for September 27, 2019.

3. None of the deadlines at issue in this Motion have expired. No party would be prejudiced by the modification of the schedule requested herein.

4. Accordingly, because the Court granted extensions of the deadline to respond to the Complaint and the page limit for its Memorandum, good cause exists for the Court to extend the deadline for Plaintiff to respond to the Motion to Dismiss and for Defendant to reply in support of its motion.

5. Good cause also exists for extending the deadline for the parties to hold their Rule 26(f) conference and the Court to hold its Rule 16(b) scheduling conference. Given the complexity and breadth of the issues involved in the Motion to Dismiss, the parties and the Court will be in a better position to properly determine a discovery and trial schedule once briefing on the Motion to Dismiss is completed.

6. The parties therefore respectfully request the Court to modify the deadline for Plaintiff to respond to Defendants' Motions to Dismiss to and including August 31, 2019, and the deadline for Defendants to reply in support of their Motions to Dismiss to and including September 14, 2019. The parties also respectfully request that this Court enter an Order setting the date of their Rule 26(f) conference as no later than October 15, 2019, and the Rule 16(b) conference on October 30, 2019, or such later date as the Court's schedule permits.

7. Counsel for Defendants conferred with Plaintiff, who is proceeding *pro se*, regarding the extensions requested herein. The parties agreed to request the deadlines set forth in this Motion.

8. A proposed Order granting the requested relief is attached hereto as Exhibit A.

WHEREFORE, Plaintiff Emmanuel Ogebe and Defendants Dow Jones & Company, Inc., Drew Hinshaw and Joe Parkinson respectfully request that the Court grant this Motion and enter an Order extending the deadline for Plaintiff to respond to Defendants' Motions to Dismiss to and including August 31, 2019, and the deadline for Defendants to reply in support of their Motions to Dismiss to and including September 14, 2019. The parties also respectfully request that this Court enter an Order setting the date of their Rule 26(f) conference as no later than October 15, 2019, and the Rule 16(b) conference on October 30, 2019, or such later date as the Court's schedule permits.

Dated: August 2, 2019



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*Plaintiff Pro Se*

/s/ Matthew E. Kelley

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*Counsel for Defendants  
Dow Jones & Company, Inc.,  
Drew Hinshaw and Joe Parkinson*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2nd day of August, 2019, I caused a copy of the foregoing to be filed electronically with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all interested parties.

/s/ Matthew E. Kelley

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